

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Apr 19, 2021

SEAN F. McAVOY, CLERK

UNITED STATES OF AMERICA,

vs.

CASANDRA CHARLENE HOPE
RAND

2:19-CR-0185-WFN-2

File No.

AGREEMENT FOR SUPERVISED PRE-TRIAL DIVERSION

It appearing that you have committed an offense against the United States beginning on or about November 2015 until October 15, 2019, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), 846, in that you did knowingly and intentionally combine, conspire, confederate and agree together with others, both known and unknown, to commit the offense of distribution of a mixture or substance containing a detectable amount of methamphetamine and/or heroin.

Upon your accepting responsibility for this act, and it further appearing, after an investigation of the offense, and your background, that the interest of the United States, your own interest and the interest of justice will be served by the following procedure.

Therefore, on the authority of the Attorney General of the United States, Joseph H. Harrington, Acting United States Attorney for the Eastern District of Washington, and Caitlin Baunsgard, Assistant United States Attorney for the Eastern District of Washington, prosecution in the Eastern District of Washington for this offense shall be deferred for a period of 60 months from the date of the signing of this agreement, *provided* you abide by the following conditions and the requirements of the program set out below (Conditions of Pre-Trial Diversion).

1 After three years of supervision under this agreement, if all the below conditions
2 have successfully been met and complied with, the Defendant may petition for
3 early termination of this agreement.

4 Should you violate the conditions of this supervision, the United States
5 Attorney may revoke or modify any conditions of this pre-trial diversion program,
6 which shall in no case exceed 60 months. The United States Attorney may release
7 you from supervision at any time, at its discretion. The United States Attorney
8 may at any time within the period of your supervision initiate prosecution for this
9 offense should you violate the conditions of this supervision and will furnish you
10 with notice specifying the conditions of your program which you have violated.

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12 If, upon completion of your period of supervision, a pre-trial diversion
13 report is received to the effect that you have complied with all the rules,
14 regulations, and conditions above mentioned, no prosecution for this offense
15 will be further pursued in this District, and any remaining Counts in this
16 Indictment will be dismissed with prejudice.

17 Neither this agreement nor any other document filed with the United States
18 Attorney as a result of your participation in the Pre-Trial Diversion Program will be
19 used against you, except for impeachment purposes, in connection with any
20 prosecution for the above described offense.

21 **CONDITIONS OF PRE-TRIAL DIVERSION**

- 22
- 23 1. You shall not violate any law (federal, state, tribal or local). You shall
24 immediately contact your pre-trial diversion supervisor if arrested and/or
25 contacted by any law enforcement officer.
 - 26 2. You shall complete a mental health evaluation and comply with any treatment
27 recommended. You shall sign all necessary releases of information.
 - 28 3. You shall complete a substance abuse evaluation and comply with any treatment
recommended. You shall sign all necessary releases of information.

4. You shall attend school or work regularly at a lawful occupation. When out of work or unable to attend school, you shall notify your pre-trial diversion supervisor at once. You shall consult your pre-trial diversion supervisor prior to job or school changes.
5. You shall continue to live in this judicial district. If you intend to move out of the district, you shall inform your pre-trial diversion supervisor so that the appropriate transfer of program responsibility can be made.
6. You shall report to your pre-trial diversion supervisor as directed and keep him/her informed of your whereabouts. You shall respond truthfully to all inquiries from your pre-trial diversion supervisor and follow all directives.
7. You shall pursue participation in the STEP Program for the Eastern District of Washington. It is unknown at the time of the entry of this Agreement whether or not you will qualify; however, you shall make good faith efforts to pursue program participation. If accepted, you shall fully complete the STEP Program.

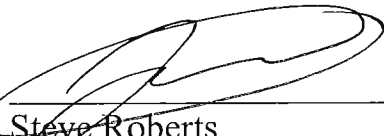
WAIVER OF SPEEDY TRIAL RIGHTS

I, CASANDRA RAND, assert and certify that I am aware of the fact that the Sixth Amendment to the Constitution of the United States provides that in all criminal prosecutions the accused shall enjoy the right to a speedy and public trial. I also aware that Rule 48(b) of the Federal Rules of Criminal Procedure provides that the Court may dismiss an indictment, information, or complaint for unnecessary delay in presenting a charge to the Grand Jury, filing an information or in bringing a defendant to trial. I hereby request that the United States Attorney for the Eastern District of Washington defer any prosecution of me for violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), 846, for a period of 60 months from the date of signing this agreement.

To induce him to defer such prosecution I agree and consent that any delay from the date of this agreement to the date of the initiation of the prosecution, as provided for in the terms expressed herein, shall be deemed to be a necessary

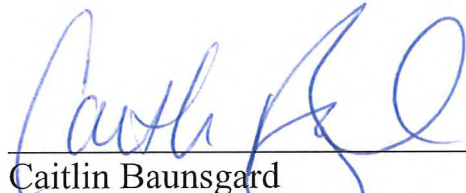
1 delay at my request and I waive any defense to such prosecution on the ground
2 that such delay operated to deny my speedy trial rights under statute, court rule,
3 and/or the Constitution. I further agree to waive any defense that such
4 prosecution would be barred by the statute of limitations.

5 I hereby state that the above has been read by me. I understand the
6 conditions of my pre-trial diversion and agree that I will comply with them.
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11 Steve Roberts
12 Defendant's Attorney

4/19/2021
DATE

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15 Caitlin Baunsgard
16 Assistant United States Attorney

4/19/21
DATE

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19 APPROVED, without passing judgment on the merits or wisdom of this diversion.
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23 Wm. Fremming Nielsen
24 United States District Court Judge

4/19/21
DATE

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27 I hereby state that the above has been read by me. I understand the
28 conditions of my pre-trial diversion and agree that I will comply with them.

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2 Cassandra M Rand 04/19/2021
3 CASANDRA CHARLENE HOPE RAND DATE
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